

CORRES. CONTROL
OUTGOING LTR NO.**EG&G ROCKY FLATS**DOE ORDER# 4700.1
95 RF00967

EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

DIST.	LTR	END
AMARAL, M.E.		
BURLINGAME, A.H.		
BUSBY, W.S.		
BRANCH, D.B.		
CARNIVAL, G.J.		
DAVIS, J.G.		
FERRERA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
GOLAN, P.M.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HEDAH, T.		
HILBIG, J.G.		
HUTCHINS, N.M.		
JACKSON, D.T.		
KELL, R.E.		
KUESTER, A.W.		
MAHX, G.E.		
MCDONALD, M.M.		
McKENNA, F.G.		
MONTROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
PIZZUTO, V.M.		
RISING, T.L.		
SANDLIN, N.B.		
SCHWARTZ, J.K.		
SETLOCK, G.H.		
STEWART, D.L.		
STIGER, S.G.	X	
TOBIN, P.M.		
VOORHEIS, G.M.		
WILSON, J.M.		
Burmester, M.C.	X	
Broussard, M.E.	X	
Guinn, G.D.	X	
Guinn, J.	X	
Hollowell, L.	X	
Schmickler, A.C.	X	
CORRES. CONTROL	X	X
ADMIN RECORD/080	X	
TRAFFIC		
PATS/T130G	X	

CLASSIFICATION:

UCNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER

SIGNATURE	
DOCUMENT CLASSIFICATION	
REVIEW WAIVER PER	
CLASSIFICATION OFFICE	
DATE	

IN REPLY TO REF. CC NO:

DOE 7-95-RF

ACTION ITEM STATUS

PARTIAL OPEN

CLOSED

LTR APPROVALS:

ORIG & TYPIST INITIALS

MBU.alc

January 20, 1995

95-RF-00967

Jessie M. Roberson
Assistant Manager for
Environmental Restoration
DOE, RFFO

Attn: B. I. Williamson

CLARIFICATION OF ACCEPTANCE CRITERIA FOR THE DECONTAMINATION PADS SGS-032-95

Action: None required

The purpose of this letter is to provide clarification of the acceptance criteria for the Decontamination Pad, Unit 18.01. In addition, the "inaccuracies" referred to in the Department of Energy letter, Reference No. ER:BIW:12645 are clarified.

Documentation of the acceptance criteria for wastes that are accepted, generated, or stored at the Decontamination Facility is presently contained in the documents listed below. It is EG&G's intent to write a Document Modification Request (DMR) to existing procedure 4-148-ENV-OPS-FO.12 (FO.12), Decontamination Facility Operations to establish the acceptance criteria in a single document.

- The established waste codes that are acceptable at the facility can be found in the Part A Permit. These codes were referenced in the November 18, 1994 EG&G letter (94-RF-11571).
- The Field Sampling Plan for Main and Protected Area Decontamination Facilities, RFP/ERM-94-00006, Section 3.0, Table 3-1, 3-2, and figure 3-3 contains the acceptance criteria for OU1/891 and 374 Liquid Waste Evaporator. This is a controlled document and a copy can be obtained from Environmental Restoration Document Control.

Clarification of the five items identified in the letter, Reference No. ER:BIW:12645 are discussed below. As stated in the EG&G November 18, 1994 letter (94-RF-11571), the lists that were provided are waste and equipment that are presently accepted and anticipated in the future at the Decontamination Facilities and the options for dispositioning the waste generated. The decontamination facility wash water can be dispositioned at four treatment facilities; OU1 Treatment Unit (891), OU2 Field Treatability Unit (FTU), Building 374 Liquid Waste Treatment Operations, and the Sewage Treatment Plant (STP). The unit to which each batch of decontamination facility wash water will be dispositioned is determined on a batch-by-batch basis, based on the types of equipment decontaminated, the type of wastes accumulated, and the concentrations of specific analytes in the wastes generated. **These facilities accept decontamination wash water from the different types of activities listed, not the equipment.**

- 1) Page 2, first bullet: Equipment to be decontaminated at the decontamination pads should not be contaminated with hazardous debris, as the criteria for the size of the hazardous debris is greater than approximately 2.5 inches; hazardous debris itself cannot be decontaminated, but must be treated to remove the hazardous waste.

RESPONSE: Everything that is accepted at the Main Decontamination Facility (MDF/Unit 18.01) is either recycled or reused. The MDF does not accept hazardous debris because it is not a permitted treatment facility. Hazardous debris will not be accepted unless a treatment permit is granted. However, non-hazardous materials and equipment may be decontaminated at the facility.

- 2) Page 2, second bullet: It is illegal to decontaminate non empty containers: that is dilution. The containers must be empty previous to decontamination. Tanker trucks are given as an example of a container; tanker trucks do not meet the definition of container.

RESPONSE: The decontamination facilities can accept non empty containers if they are non-hazardous or hazardous containers if they meet the definition of RCRA empty. Hazardous containers that do not meet the definition of RCRA empty will not be accepted. According to 6CCR 1007-3, 17 CR the definition of a container is: "container" means any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled. 6CCR 1007-3, 17 CR 3, states: "Tank" means a stationary device, designed to contain an accumulation of hazardous waste which is constructed primarily of non-earthen materials (e.g., wood, concrete, steel, plastic) which provide structural support. Tanker trucks meet the definition of container.

- 3) Page 3, OU1 and OU2 headings: Document references are not provided for the OU1 and OU2 acceptance criteria.

RESPONSE: The present acceptance criteria for OU1 and OU2 is documented in a letter dated July 25, 1994, Reference No. 94-DOE-08056. The acceptance criteria for these facilities is presently being revised in order to accommodate the Sitewide Treatment Facility.

- 4) Page 3, all four headings: Tanker trucks, empty containers, sludge suckers and equipment are not treated in the four water treatment facilities listed; they are decontaminated and the decontamination water goes to these four facilities.

RESPONSE: Clarification will be made in the DMR to FO.12 to make it clear that it is the decontamination wash water and not the equipment itself that is treated at the facilities.

- 5) Page 3, Sewage Treatment Plant (STP) heading: Equipment that has been determined to be a hazardous waste cannot be decontaminated, it must be treated. If the equipment is for reuse or salvage, it can be decontaminated, but it is not sent to the STP, only the water may be. Also, the STP does not appear to have either interim status or a Part B permit for treatment of hazardous waste. Why is it accepting hazardous waste for treatment?

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RESPONSE: Under no circumstance does the STP accept hazardous waste for treatment. The list states what types of decontamination activity is accepted at the MDF in order for the water to be transferred to the STP for treatment. Equipment that once contained or was in contact with a hazardous waste that meets the definition of RCRA empty and will be reused or recycled can be accepted at the decontamination facility. Equipment that is non-empty, non-hazardous can be decontaminated at the MDF. Review of the concentrations of specific analytes in the generated waste will be analyzed. If it meets STP's acceptance criteria, it can be transferred to the facility for treatment. A draft letter was sent from EG&G for DOE to submit to EPA; RE: National Pollutant Discharge Elimination System Internal Wastestream Notification detailing the acceptance criteria.

Any additional questions on the Main Decontamination Facility, RCRA Unit 18.01, may be directed to Annette Schmiechen at extension 3191.



S. G. Stiger, Director
Environmental Restoration Program Division
EG&G Rocky Flats, Inc.

MBU:alc

Orig. and 1 cc - J. Roberson

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